



Setti D. Warren  
Mayor

**City of Newton, Massachusetts**  
Department of Planning and Development  
1000 Commonwealth Avenue Newton, Massachusetts 02459

Telephone  
(617) 796-1120  
Telefax  
(617) 796-1142  
TDD/TTY  
(617) 796-1089  
[www.newtonma.gov](http://www.newtonma.gov)

Candace Havens  
Director

November 13, 2013

[By Electronic Mail and Regular Mail]

David Hanifin, Senior Loan Officer  
Massachusetts Housing Partnership  
160 Federal Street  
Boston, Massachusetts 02110

RE: M.G.L. Chapter 40B Comprehensive Permit Site Eligibility Application

Project Name:	The Manchester
Location:	135 Wells Avenue, Newton, MA
Number of Proposed Units:	334
Subsidizing Agency:	Massachusetts Housing Partnership
Applicant:	135 Wells Avenue, LLC.
Development Company:	Cabot, Cabot & Forbes

Dear Mr. Hanifin:

Thank you for the opportunity to comment on the Site Eligibility application recently submitted by Cabot, Cabot, and Forbes (the "Applicant") for 135 Wells Avenue, Newton (the "Project"). This letter constitutes the City's response to your letter addressed to Mayor Warren, dated October 14, 2013 seeking comments regarding the Project as part of Massachusetts Housing Partnership's consideration of the Applicant's request for Site Eligibility. Written comments received by the Newton Planning and Development Department (the "Department") from other interested parties are being sent to you under separate cover.

Our City has always been deeply committed to the creation of affordable housing opportunities in Newton and we welcome well planned Comprehensive Permits at appropriate locations that are fittingly designed for the existing neighborhood context, and where access to the site is

suitable for the numbers of vehicles involved. Overall, Newton supports the idea of adding to the vibrancy and value of Wells Avenue by creating a more mixed-use neighborhood with the understanding that there are still many questions and concerns to be satisfactorily answered.

We note that as proposed, the Project would be the largest residential project ever developed in Newton. We also note that the properties located in the Wells Avenue Office Park are subject to a Deed Restriction that imposes a number of conditions on the development and use of these properties in addition to the City's zoning controls. It is the opinion of the Newton Law Department that the Applicant must amend the Deed Restriction to allow for the use and for exceptions to the FAR and Open Space requirements, in addition to filing for a Comprehensive Permit with Newton's Zoning Board of Appeals. The Applicant has not yet completed a comprehensive traffic study, so some of our comments may be incomplete at this point; however, we are concerned that the intersection of Wells Avenue and Nahanton Street is already failing at certain times of the day and that a development of this magnitude will exacerbate an already untenable situation.

The Department offers the following comments in response to the information provided in order to help Massachusetts Housing Partnership evaluate the request for site eligibility:

**A. Land Use, Site Plan Design and Sustainability**

The regulations for Comprehensive Permits under Chapter 40B direct that the Subsidizing Agency determine that *"the conceptual project design is generally appropriate for the site on which it is located, taking into consideration factors that may include proposed use, conceptual site plan and building massing, topography, environmental resources, and integration into existing development patterns."*<sup>1</sup>

- **Smart Growth.** The Massachusetts Department of Housing and Community Development encourages housing development that is consistent with smart growth, sustainable design, and green building practices. Goals that are encouraged include concentrating development in town centers, integrating housing where a mix of uses are available, promoting development that is compact and protects environmentally sensitive and critical habitat areas, and locating housing where residents have a variety of transportation choices other than dependence on cars for every trip they make. Newton welcomes additional housing development as long as it is integrated with and helps provide transportation and other enhancements to make the impact of development a positive one. The Department is concerned that the Project is not

---

<sup>1</sup> 760 CMR 56.04(4)(c)

consistent with smart growth principles and is heavily vehicle dependent with its lack of proximity to amenities and public transportation. Although the Applicant has recently made a commitment to implement a shuttle service between the site and an MBTA facility, we are concerned that the majority of trips to and from this site will necessitate a vehicle. We strongly encourage the Applicant to continue to detail how they will increase transportation options for residents of this site and other businesses located in Wells Avenue so as to reduce single-occupancy vehicle dependence.

- Land Use.** Newton values its commercially zoned real estate and is concerned about the turnover of this parcel from commercial to housing use. As Newton is a mostly residential suburb, areas that are specifically zoned for manufacturing and commercial office space must be maintained in order to strengthen Newton's commercial tax base. The 2007 *Comprehensive Plan* notes that the Wells Avenue area is "*dominated by office and business uses*"<sup>2</sup> and states that "*Zoning should continue to encourage office and business uses (perhaps more intensively) in this location and exclude other uses as a means of maintaining the City's employment and tax base.*"<sup>3</sup> The proposed residential development at this site is not consistent with Newton's *Comprehensive Plan* unless additional transportation options can be provided.
- Deed Restriction.** It is the opinion of the Newton Law Department that the Applicant must amend the Deed Restriction to allow for the use and for exceptions to the FAR and Open Space requirements, in addition to filing for a Comprehensive Permit with Newton's Zoning Board of Appeals. Namely, the Deed Restriction limits a parcel's Floor Area Ratio (FAR) to .25 and requires a minimum of 40 percent Open Space. The following table illustrates how the proposed Project compares to the zoning requirements:

Limited Manufacturing	Allowed	Existing	Proposed
Lot Size	NA	276,492 square feet	No change
Max Stories/Building Height	3 stories/36 feet	1 story/38 feet	<b>6 stories/93 feet</b>
Setbacks			
<ul style="list-style-type: none"> <li>Front</li> </ul>	25 feet	94.3 feet	25 feet
<ul style="list-style-type: none"> <li>Side (north)</li> </ul>	20 feet	23.9 feet	<b>18.2 feet</b>

<sup>2</sup> Newton *Comprehensive Plan*, 2007. Page 3 - 28

<sup>3</sup> Newton *Comprehensive Plan*, 2007. Page 3 - 28

Limited Manufacturing	Allowed	Existing	Proposed
Setbacks <ul style="list-style-type: none"> <li>Side (west)</li> <li>Side (south)</li> <li>Rear (east)</li> </ul>	20 feet 40 feet 40 feet	92.9 feet 504.5 feet 67.9 feet	48.9 feet 320.4 feet <b>30 feet</b>
FAR	.25	.19	<b>1.99</b>
Max. Lot Coverage	25% Max	19%	<b>47%</b>
Open Space	40% Min	NA	<b>NA</b>

As shown in the table above, the Project will exceed the maximum permitted height, number of stories, floor area ratio, maximum lot coverage, and will encroach into the side and rear yard setbacks based on the dimensional controls established for this location.

- Environmental Impact.** The site is mapped as an Estimated and Priority Habitat for the Blue-spotted Salamander, which is a Species of Special Concern per the Natural Heritage and Endangered Species Program (NHESP). NHESP recommends a protected habitat area of between 300 and 800 feet from the vernal pool boundary. The closest vernal pool is about 170 feet from the site. This project would therefore further encroach into the recommended boundary than the existing development, potentially endangering this species or resulting in an “Adverse Effect” to the actual resource area habitat for the subject species. Avoidance and minimization of impacts to this rare species and its habitats is a concern of Newton’s. It is the Department’s understanding that the Applicant must file and receive a determination from the NHESP regarding any required mitigation efforts. Furthermore, a Request for Determination of Applicability should be filed with the Newton Conservation Commission.

The Site Eligibility application does not address stormwater management. The redevelopment of this site could substantially improve the health of the adjacent uplands and wetlands alike by ensuring maximal on-site stormwater infiltration. Much of the project site will be covered with roof. That relatively clean stormwater should be able to be directed to underground infiltration chambers. The pavement that is outside of the roof footprint covers a relatively small area; this pavement could be installed as permeable pavement.

- **Density.** The Applicant is proposing a density of 828 sq.ft. of lot area per unit, which is significantly lower than the average of lot area per unit of recently approved Comprehensive Permits in Newton of 1,439 sq.ft. Although there is no minimum lot area per unit requirement for the Limited Manufacturing zone, the Department recommends a lot area per unit of no less than 1,200 square feet. Reducing the number of units in the Project would help achieve the desired lot area per unit ratio.
- **Massing.** The Department is concerned that the proposed massing and siting of the building is out of context with the character of the existing neighborhood and believes the Project must provide a more successful transition with its immediate abutters. The proposed building is six stories with a peak height of 93 feet, which would make it one of the tallest buildings in Newton, and certainly in the immediate area, where the vast majority of structures are one- and two-story office buildings. The impact of the proposed height and mass on the streetscape and abutting properties is amplified by the distance of the setbacks from the street and side lot lines. To mitigate the impact of the Project the Department encourages the Applicant to place the parking below grade, to decrease the number of stories to three-or four-stories, and to increase the front and side yard setbacks.
- **Building Design and Architecture.** At the site visit and in the “Experience of the Sponsor” section of the application the Applicant cites Charles River Landing in Needham as a comparable and as a project the Applicant developed. The Department notes that the Needham building is only four stories in height and is located closer to amenities, including transportation (bus line), grocery stores (Baza on Needham Street, Trader Joes in Needham), general amenities such as retail and restaurant uses, and quality open space (this project is directly adjacent to the Charles River and DCR pathway). Building materials of this Needham development appear far superior to those proposed in Newton, based on the renderings provided. We encourage the use of brick, stone and other natural building materials at this site instead of what appears to be panels shown in the rendering. The Department is also concerned that the architectural design of the proposed building may be too generic for a project of this magnitude and suggests adding greater variations in the building height and more elegant architectural details that relate to its surroundings.
- **Building Amenities.** Although the Applicant notes that the target market includes young professionals, empty nesters, and older professionals in a “transient” stage of life, the Department believes that the proposed Project will attract a significant number of families due to the reputation of Newton’s school system. The Department

is concerned that planned amenities for this building do not account for the likely reality that a number of units will include school age children. As there are no playgrounds within walking distance, the Department recommends some family-friendly features be included in the amenities package.

- **Open Space.** The amount of proposed open space is not provided in the application, although it is an identified submittal as part of the Site Eligibility application under 760 CMR 56.04 (2)(g). This calculation should be submitted to the City. The Department is concerned that useable open space on-site consists of three raised courtyards, including one courtyard with a pool. The Department feels that the courtyards will not bring the same benefits to the residents as at-grade natural open space. The Department recommends more natural open space at grade be incorporated into the site plan and/or explore connections to the natural environment in the vicinity, thus making more of an amenity for the community at large.
- **Retail Space.** 2,300 square feet of non-residential flex space is proposed as retail to serve the residents as well as the surrounding users, such as a coffee shop or convenience store, if financially feasible. The Department strongly encourages the retention of this space in the development, particularly for the use as a convenience or small grocery store, as it may help to reduce vehicle trips by residents and other users of Wells Avenue, who would then be able to satisfy some basic needs without additional trips.
- **Green Building.** The application states that the Project will seek Energy Star and LEED Certification but does not specify what level of certification the Applicant intends to achieve. We believe the Applicant should commit to achieving LEED certification at a Silver level or better for the core and shell of the building. This effort would align with the City's policy that the site planning, building design, construction, maintenance or long-term operation of a premises will contribute significantly to the efficient use and conservation of natural resources and energy.
- **Tree Removal.** The Applicant did not submit a tree removal plan but it appears that mature trees located at the front of the site will be removed in order to accommodate the proposed new structure and entrance drive. The Department believes that it is imperative that the applicant protect these mature trees and submit a landscape plan showing all trees to be removed and planted prior to filing with the Zoning Board of Appeals. We strongly encourage the planting of additional evergreen trees along the

front and side property lines in order to help screen the mass of this structure from the street and abutters.

## **B. Affordable Housing Need**

Newton has a longstanding commitment to affordable housing, having made measurable progress in creating and preserving opportunities for affordable housing that address the goals of Chapter 40B. As of April 10, 2013, 2,436 of the City's 32,346 housing units, or 7.5 percent, were included on the Subsidized Housing Inventory. Currently, an additional 65 eligible units are in the pipeline. The City also has an additional 29 occupied affordable units serving households with incomes between 80 and 100 percent of Area Median Income (AMI). Nonetheless, there is a clear demand for affordable rental housing. Over 1,000 households are on affordable housing waiting lists for existing multifamily developments in Newton.<sup>4</sup>

- **Existing Housing Stock and Household Income.** Newton's housing stock is diverse in age, size, design and type. Approximately 54 percent of Newton's housing units are detached single-family homes. 18 percent are two-family homes and 22 percent are multi-family buildings. Although the Newton median household income is \$107,696, approximately 25 percent of Newton households earn less than 80 percent of the area median income (AMI).<sup>5</sup> Additionally, a steady increase in property values have created less affordability for some existing Newton residents.<sup>6</sup> According to federal data, 15 percent of Newton renter households have a housing cost burden greater than 30% of their income, which is regarded as unaffordable.<sup>7</sup>
- **Affordability Mix.** The *Comprehensive Plan* is sensitive to the turnover created from Newton's extraordinary high housing costs that "*results in economic stratification, threatening to turn the City into a place where almost all households either are very affluent or are living in subsidized housing.*"<sup>8</sup> The chart below illustrates Newton household income distribution in 2000 and 2007.<sup>9</sup>

---

<sup>4</sup> According to survey conducted by Planning staff in Summer 2013

<sup>5</sup> U.S. Dept. of Housing and Urban Development; Comprehensive Housing Affordability Strategy Data, 2006-2010

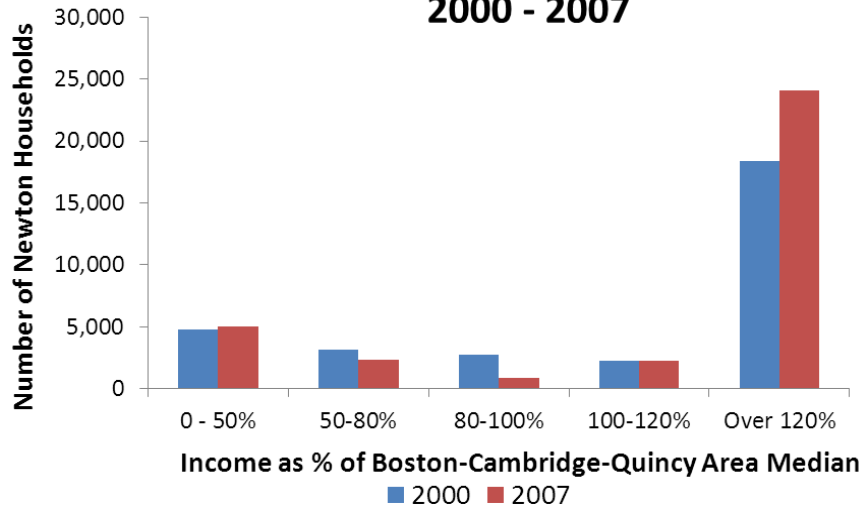
<sup>6</sup> Newton Comprehensive Plan, 2007

<sup>7</sup> U.S. Dept. of Housing and Urban Development; Comprehensive Housing Affordability Strategy Data, 2006-2010

<sup>8</sup> City of Newton Comprehensive Plan, 2007 (page 5-5)

<sup>9</sup> Area Median Income based on 3-person household. Source: Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data; American Community Survey, 2008

## Newton Household Income Distribution 2000 - 2007



To this end, the *Comprehensive Plan* encourages a mix of housing opportunities for low-, moderate, - and middle-income households.<sup>10</sup> The chart below shows the existing affordability mix within the City's Subsidized Housing Inventory, as of April, 2013.

100% - 81% AMI	80% - 70% AMI	65% - 51% AMI	50% - 31% AMI	≤ 30% AMI
3%	30%	3%	28%	36%

The City's economic diversity would further benefit from an affordability mix that responds to the existing gaps within Newton's affordable inventory. The Department encourages the Applicant to explore and present an alternative affordability mix that does not exceed the proposed building size or number of units.

- Bedroom Mix and Affordability.** The Project's target demographic responds to a certain degree to the *Comprehensive Plan's* goal of increasing affordable rental opportunities for starter households and empty nesters. However, 14 percent of existing Newton households with five or more members earn below 80 percent of the AMI.<sup>11</sup> The Project currently apportions 20 percent of the three-bedroom units as affordable; this is the lowest percentage of any bedroom mix as shown below.

<sup>10</sup> "Low-income households" is defined here as households earning 50 percent or less of the area median income. "Moderate-income households" is defined here as households earning 80 percent or less of the area median income.

<sup>11</sup> U.S. Dept. of Housing and Urban Development; Comprehensive Housing Affordability Strategy Data, 2006 – 2010



Unit Type	Total Units	Total Affordable	Percent Affordable	Total Unit Type
Studio	19	5	26%	5.7%
1-BR	145	37	26%	43.4%
2-BR	155	39	25%	46.4%
3-BR	15	3	20%	4.5%
<b>Total</b>	<b>334</b>	<b>84</b>	<b>25%</b>	<b>100%</b>

Absent evidence that sufficient demand does not exist for additional three-bedroom units, the Department asserts that the Applicant comply with the Subsidizing Agency's existing 10 percent three-bedroom policy. At the least, and in keeping with the Commonwealth's Sustainable Development Characteristics of Advancing Equity and Expanding Housing Opportunities, the Department requests that the Applicant increase the number of affordable three-bedroom units.

- **Transportation Equity.** As is articulated elsewhere in this response, the Project is not proximate to a variety of public transportation. The Applicant made a commitment to the City to implement a shuttle service, but does not yet provide details. The Department recognizes the preliminary nature of this proposal, but believes it is essential for the Applicant to consider the affordability and breadth of this, or other alternative modes of transportation, when structuring the program to assure that viable options can be provided.

### C. Previous Municipal Actions

The City is committed to making progress on the creation and preservation of affordable housing through its financial, institutional and regulatory resources. Recent development projects focus on sustainability, providing a higher level of accessibility where otherwise not required by law, and a greater percentage and mix of affordability.

- **New Affordable Housing Development.** The City has expended substantial municipal and federal resources in support of its affordable housing programs and initiatives to create and preserve affordable housing. Since 1974, the City has funded more than \$25 million in Community Preservation Act (CPA), Community Development Block Grant, (CDBG) and HOME Investment Partnerships Program funds for affordable housing development projects. Over 30 percent of the CPA funds (20 percent above the regulatory requirement) have been expended on the creation of community housing.

*Parkview Homes* – In 2011, SEB, LLC. completed Parkview Homes with the assistance of a Comprehensive Permit and approximately \$4 million in City-administered CPA, HOME and CDBG funding. All 10 units are deed restricted, with six of the 10 units affordable to households earning up to 80 percent of AMI. The remaining four are affordable to households earning below 100 percent of AMI. Nine units have three bedrooms and one two-bedroom single-family unit is accessible for individuals with mobility disabilities, although not required by law. Parkview Homes is the first mixed-income, all-affordable homeownership development in Newton. It also received LEED Gold status, the highest rating of any public or private multi-family project in the City.

*Covenant Residences* – Completed in 2011, Covenant Residences / 33 Commonwealth Ave. consists of 11 homeownership units affordable in perpetuity to households earning up to 80 percent of area median income, in a two-building project: one rehabilitated 13-unit building and a new 44-unit building. The developer was awarded a Comprehensive Permit and \$907,825 in Community Preservation Funds, and returned \$300,000 to the City's Community Preservation fund, per a revenue-sharing agreement. In 2010, Covenant Residences won the Jack Kemp Workforce Housing Models of Excellence Award from the Urban Land Institute.

*Myrtle Village* – At present, the City is considering a proposal from Myrtle Baptist Church to rehabilitate and construct seven units of mixed-income, all-affordable housing in the Myrtle Baptist Church Neighborhood Historic District . One of the units will be accessible for persons with a mobility disability, although not required by law. The developer is seeking \$1,853,858 in Newton-controlled financing. The proposal is also seeking a Comprehensive Permit and has received Local Initiative Program support from the Newton Housing Partnership.

- **Redevelopment of Existing Market Rate Housing.**

*54 Eddy Street* – In 2012, the City provided \$945,250 to its designated Community Housing Development Organization, CAN-DO, Inc., to acquire and rehabilitate an existing two-family house. The project will create two units of permanently affordable rental housing once complete. The two-bedroom unit is affordable for households earning up to 50 percent of the AMI and the three-bedroom unit is affordable to households earning up to 80 percent of AMI. The project was underwritten so that residents are able to afford the units without the need for rental assistance.

*61 Pearl Street* – In 2011, the City provided CDBG, HOME and CPA funds to assist CAN-DO, Inc. to acquire, delead and rehabilitate a multi-family home and create three

two-bedroom units of affordable rental housing. The project includes one first floor unit that is accessible to people with mobility disabilities, although not required by law. Each unit is affordable to households earning less than 65 percent of AMI.

- **Inclusionary Zoning.** Newton was one of the first cities in the Commonwealth to enact an inclusionary zoning ordinance. The current ordinance requires developments requiring a special permit set aside 15 percent of the units as affordable to income-eligible households. Since its adoption in 1977, the ordinance has resulted in the creation of over 250 affordable units, with approximately 50 affordable units currently in the pipeline. Depending on the number and type of inclusionary units in a development, the AMI of qualifying households may range from 80 percent or less for rental to up to 120 percent for homeownership. The following pipeline projects are subject to Newton's Inclusionary Zoning Ordinance:

*Austin Street* – Emerging from the *Comprehensive Plan*, Austin Street is a municipal parking lot on 74,000 sq.ft. located in the heart of Newtonville. The City issued a request for proposals to redevelop the site into a mixed-use development with a minimum of 18 housing units. The City is requiring 25 percent of the units be affordable, which is above the 15 percent threshold required by the Inclusionary Zoning Ordinance. The City is currently reviewing six proposals that range from 6 to 25 new affordable units.

*The Station at Riverside* – This project is a mixed-use, transit oriented development located next to the Riverside MBTA station. The project was granted a special permit in 2013 for an office building of approximately 225,000 sq. ft., a residential building containing 290 apartments (44 of which will be affordable) with 5,000 sq. ft. of retail space, a three-story building containing approximately 15,000 sq. ft. of retail space and approximately 8,000 sq. ft. of community space.

*152 Adams Street* – This rental development is within the village of Nonantum. One of the nine units will be affordable to households earning 80 percent or below of AMI, per the Inclusionary Zoning Ordinance. Each of the first floor units will be fully accessible to persons with mobility disabilities, although not required by law.

- **Planning Efforts and Zoning Reform.** The City is making efforts within its current zoning to provide additional affordable housing options geared to singles, young couples and empty nesters. The Department and the Newton Housing Partnership have docketed a proposal to enable the creation of scattered, small housing developments with units priced substantially lower than is common without subsidies or deed restrictions. The

proposal to create naturally affordable, compact housing is in response to a recent research by the Newton Housing Partnership that concludes “...large single-family homes predominate and the number of smaller homes is steadily decreasing through tear-downs and upgrades. ...(L)ea(v)ing few options for young singles and married couples beginning their careers seeking housing in Newton, and for empty-nesters who wish to downsize and stay in the community.”

- **Local Initiative Program / Chapter 40B Proposals.** The Department is currently reviewing and considering support for two Local Initiative Program proposals. These proposals will yield 16 affordable units, should they receive a Comprehensive Permit. Aside from the Myrtle Village project described above, the Department is also reviewing a proposal to create 36 homeownership units including 9 affordable at 75 and 83 Court Street in Newtonville. The project developer has met with the neighborhood and the Newton Housing Partnership on numerous occasions before submitting a Site Eligibility application under the Local Initiative Program.

#### **D. Traffic, Parking and Transportation Impacts**

- **Traffic.** Based on 2010 traffic volume and preliminary trip generation data provided by the developer's traffic consultant,<sup>12</sup> the City is concerned the Project will have an adverse effect on the Nahanton Street corridor, in particular the intersection with Wells Avenue. This preliminary analysis concluded that the intersection fails (LOS F with long queues) during peak hours (morning and afternoon). The Department recommends that the Applicant submit a comprehensive traffic study that includes the intersections at Wells Avenue and Nahanton Street; Nahanton Street and Winchester Street; Nahanton and Dedham Street; as well as analyzing new development planned at the New England Business Center in Needham along the Needham Street Corridor; and the Kendrick Street Add-a-Lane project. In addition to submitting a traffic study, the Department requests that the Applicant pay for an independent peer review of such study to be completed on behalf of the City.
- **Access to Public Transportation.** Access to and from the Project site currently lacks viable alternatives to the private vehicle, and is one of our primary concerns. The closest public transportation stop is located on Winchester Street north of Nahanton Street, about a mile away from the Project site, where a branch of MBTA bus route #52 provides weekday service at very infrequent intervals and no weekend service. We are

---

<sup>12</sup> The traffic volume counts from the Add-a-Lane project is not yet available

unaware of any type of public shuttle system that currently provides service along Wells Avenue. Without a public transportation shuttle service in place, nearly all resident and visitor trips to and from the Project site would need to be made via private vehicle. A new residential development so highly dependent on private vehicular access is in conflict with stated City and State goals of shifting trips from private vehicles to alternative transportation modes.

- **Parking.** Given the lack of alternative transportation options, the number and size of units and location in a suburban office park, the Department is concerned that there may be insufficient parking, which may create impacts for abutting properties if residents are forced to park along Wells Avenue. The Applicant is proposing 492 parking stalls for a ratio of 1.47 stalls per unit, whereas 692 spaces are required under Newton code. Over half of the units have two or three bedrooms, and residents of the units may have two cars. The Applicant should provide more detail on the breakdown of the number of units and parking needs for not only the residential but for visitors as well for the City to better understand the appropriate number of parking stalls. The Department notes that Avalon at Chestnut Hill has two parking stalls per unit as public transportation options are limited at this location as well.

Finally, the Department notes that the proposed size of parking stalls and width of maneuvering isles within the proposed garage do not meet the City's dimensional standards in the zoning ordinance. To be able to fairly assess the parking implications further, we request that a comprehensive parking analysis of the Project site and vicinity be completed by an independent, experienced firm to demonstrate how the proposed parking will satisfy the anticipated demand at this location.

#### **E. Summary of Concerns**

Newton strives to connect excellence in land use planning, preserving natural resources, and providing transportation options when considering changes to our built environment. This is consistent with State agency efforts to encourage smart growth, livable communities, and sustainable development. Newton agrees that such principles should guide our priorities for the locations of all development, but particularly for development of housing and affordable housing opportunities, and that we should grow where it makes the most sense: near village centers, transit stations, and with pedestrian access to school, amenities, employment centers and other destinations.

The Department has strong concerns that the Project is not compatible with smart growth principles as the site lacks proximity to amenities and transportation options other than vehicle trips. As such, efforts to further integrate housing in such a way are needed to satisfy these objectives. Also of note, an existing Deed Restriction must be amended to allow exceptions to the FAR and open space requirements in addition to filing for a Comprehensive Permit. As a matter of determining impact of the Project, the Department respectfully requests that Massachusetts Housing Partnership require the Applicant to perform a comprehensive, independent parking and traffic study at the scope identified herein.

Please do not hesitate to contact me if you have any questions about the contents of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Havens", is centered on a light yellow rectangular background.

Candace Havens

Director, Planning and Development Department

Cc     Mayor Setti D. Warren  
         Donnalyn B. Lynch Kahn, City Solicitor  
         Jay Doherty, Cabot, Cabot and Forbes  
         Stephen Buchbinder, Schlesinger and Buchbinder, LLP  
         Alderman Cheryl Lappin  
         Alderman Mitchell L. Fischman  
         Alderman David A. Kalis  
         Alderman-Elect Rick Lipof